



312169

Unsel, Timothy (DNRE)

From: UNSELDT@DEQ-SW-LP.DEQ-PLAINWELL
Sent: Tuesday, May 16, 2000 4:34 PM
To: VONGUNTJ@DEQ-SC.DEQ-ERD
Cc: LEEPT@DEQ-SW-LP.DEQ-Plainwell
Subject: Allied OU Faxed Proposal for Response Action

I received your fax today and I am wondering what you would like me to do. I was out at the SP Mill last week for a meeting and observed that sheet pile was being placed along both the Willow Blvd. site and the A-site. If the waste is not removed from the back side of the sheet pile and replaced with a clean soil backfill, then the containment does not meet the requirements of Part 115. It appears that this type of containment is being approved at these sites in spite of previous comments from WMD that it would not comply with Part 115.

To my knowledge, BBL has also proposed the same type system for the Allied OU closures. If ERD chooses to approve this design, that is fine. Just be advised that it does not comply with Part 115.

It would appear that if the site is not to be closed in accordance with Part 115 then my review of the documents prepared for closure would be of limited utility.

Timothy Unsel
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Unsel, Timothy (DNRE)

From: vonguntj@DEQ-SC.DEQ-ERD
Sent: Tuesday, May 16, 2000 5:06 PM
To: UNSELDT@DEQ-SW-LP.DEQ-PLAINWELL
Subject: Re: Allied OU Faxed Proposal for Response Action

Tim-

The sheet pile which has been placed along the A-site is a voluntary interim action and was conceptually approved as being CONSISTENT with a final remedy. It is not an agency approved final remedy, which will be set forth in the Record of Decision. Part 115 will be identified as an ARAR in the ROD, and I expect the final remedy to be compliant with Part 115. Unless upper management decides otherwise, the ROD will require them to excavate waste from behind the sheet pile and backfill.

Just to be clear on what is happening where, unless they were actually driving sheet pile last week, the sheet at the A-site (right next to Willow Blvd) stops at Olmstead Creek and is not extended to the Willow Blvd portion of the site. The Allied Site (OU1) is being sheet-piled also as an interim action, without formal approval.

The Fax on King Mill is also an interim proposal that ERD does not want to approve unless everybody thinks it's a good idea. At this point, we do not believe groundwater has been adequately characterized at the Allied Operable Unit on Portage Creek and are reluctant to approve bringing additional material into the site. On the other hand, if an additional 30 to 50 thousand cubic yards is not a big deal, then excavation of King Mill would free up that property for re-use.

I'd like your review of the proposal and your comments will be passed on to the PRPs in their entirety, just like they will be for the Willow/A-site (still waiting on comments from the ERD geologist). Do you see technical or legal problems with allowing the King Mill residuals to be brought to the Allied Property? I'm just looking for a reaction to this proposal, or having you specify what you would need to see in a work plan before it could be approved.

Thanks for your help, and I do not plan on blowing off WMD comments or Part 115. Allowing the PRPs to do these interim actions at all has really made things difficult.

>>> Timothy Unsel 05/16 4:34 PM >>>

I received your fax today and I am wondering what you would like me to do. I was out at the GP Mill last week for a meeting and observed that sheet pile was being placed along both the Willow Blvd. site and the A-site. If the waste is not removed from the back side of the sheet pile and replaced with a clean soil backfill, then the containment does not meet the requirements of Part 115. It appears that this type of containment is being approved at these sites in spite of previous comments from WMD that it would not comply with Part 115.

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